

United States District Court
Southern District of Mississippi
Northern Division

Guy M. Bullis

Plaintiff

v.

Civil Action 3:22 -cv- 155 KHJ-RPM

Michael Farrell et al

Defendants

Answer

The defendants hereby answer the allegations made against them as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied.
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104.38. Denied.

The defendants demand strict proof of all of the above allegations that have been denied.

Affirmative Defenses

Now having fully answered all of the allegations made against them, the defendants assert the following affirmative defenses.

1. The plaintiff was equally responsible and negligent in failing to follow up on CSC's failure to respond to the request for a reworded release.
2. The complaint fails to state a claim upon which relief can be granted.
3. The plaintiff's claims are barred by the statute of limitations.
4. The plaintiff failed to make reasonable efforts to mitigate any damages.
5. Any acts or missions of the defendants were done in good faith.
6. The plaintiff's claims are barred by the doctrines of collateral and equitable estoppel.
7. The plaintiff waived his rights to any relief in this case.

The defendants now move the court to dismiss this case with cost taxed to the plaintiffs.

Dated May 8, 2022.

Respectfully submitted,

Michael Farrell *pro se*

The Law Office of Mike Farrell, PLLC

/s/ Mike Farrell

Mike Farrell

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Certificate of Service

I hereby certify that on May 8, 2022 the above document was filed using the court's ECF/PACER filing system which should have automatically forwarded a copy to:

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1911 Nelson Street
DuPont, WA 98327
Telephone 253-905-4488
Alana-akblaw@live.com

/s/ Mike Farrell